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Attorney for Plaintiffs Ernest Lahti, Linda Lahti and Applied Reserve Analysis, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ERNEST LAHTI, LINDA)	Case No: CV-08-02314-BZ
LAHTI AND APPLIED)	
RESERVE ANALYSIS, LLC, a)	REPLY IN SUPPORT OF PLAINTIFFS'
California corporation,)	APPLICATION FOR TEMPORARY
)	RESTRAINING ORDER AND ORDER TO
Plaintiffs,)	SHOW CAUSE FOR PRELIMINARY
)	INJUNCTION
v.)	
)	
DAN BLOOMQUIST,)	
REBECCA BLOOMQUIST,)	
HIGHLANDS ELECTRONICS)	
LLC, an Arizona corporation, and)	
DOES 1 through 50 inclusive,)	
)	
Defendants.)	
)	
)	
)	

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1 Defendants in this matter, Dan Bloomquist, Rebecca Bloomquist and Highlands
2 Electronics, LLC, have failed to file an opposition to Application for Temporary Restraining
3 Order filed by Plaintiffs, Ernest Lahti, Linda Lahti, and Applied Reserve Analysis, LLC, to
4 enjoin the termination of the licensing agreement currently in effect between the parties. In the
5 absence of any opposition, the statements by Plaintiffs of their imminent irreparable harm should
6 be accepted as true and correct, and the Temporary Restraining Order should be granted.

7 On May 9, 2008, the Court issued a Scheduling Order that required Defendants to
8 consent or decline the use of the Magistrate in this matter by May 14, 2008, for all parties to
9 submit oppositions to the other parties' motions by May 16, 2008 and for corresponding replies
10 to be filed by May 21, 2008. Defendants timely filed their consent to Magistrate on May 14,
11 2008. However, they have not subsequently filed their Opposition to Plaintiffs Application for a
12 Temporary Restraining Order.

13 Plaintiffs, therefore, file this Reply as a Notice that Defendants have failed to present any
14 facts opposing this Temporary Restraining Order. As such, the facts that Plaintiffs have
15 presented clearly demonstrate the imminent threat of irreparable harm to their business and its
16 goodwill. Therefore, Plaintiffs' Application for Temporary Restraining Order should be granted.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ERNEST LAHTI, LINDA)
LAHTI AND APPLIED)
RESERVE ANALYSIS, LLC, a)
California corporation,)

Plaintiffs,)

v.)

DAN BLOOMQUIST,)
REBECCA BLOOMQUIST,)
HIGHLANDS ELECTRONICS)
LLC, an Arizona corporation, and)
DOES 1 through 50 inclusive,)

Defendants.)

Case No: C08-2314 BZ

CERTIFICATE OF SERVICE

1 I declare:

2 I am employed in the County of San Francisco, State of California. My business address is 25
3 Jessie Street, 16th Floor, San Francisco, CA 94105. I am over the age of eighteen years, and I am
4 not a party to the within action. On May 21, 2008 I served the following documents:

- 5 • **REPLY IN SUPPORT OF PLAINTIFFS' APPLICATION FOR TEMPORARY**
- 6 **RESTRAINING ORDER AND ORDER TO SHOW CAUSE FOR**
- 7 **PRELIMINARY INJUNCTION; AND**
- 8 • **CERTIFICATE OF SERVICE.**

9 Upon the party listed below, addressed as follows:

10 **Rebecca Bloomquist**
11 **P.O. Box 797**
12 **Vernon, Arizona 85940**
13 **Rebecca@lakeweb.com**

Dan Bloomquist
P.O. Box 797
Vernon, Arizona 85940
Dan_b@lakeweb.com

14 **Highlands Electronics**
15 **P.O. Box 797**
16 **Vernon, Arizona 85940**
17 **Rebecca@lakeweb.com**

18 **XXX First Class Mail:** By depositing a sealed envelope in the United States mail at San
19 Francisco, California, with postage fully prepaid.

20 **Facsimile:** By transmitted a true and correct copy via facsimile electronic equipment
21 transmission (fax) to the office(s) of the addressee(s) at the fax number(s) listed above.

22 **Personal Delivery:** By personally delivering the document(s) listed above to the
23 person(s) at the address(es) on the date set forth above.

24 **XXX Electronic Mail:** On May 21, 2008 at 12:15 pm I transmitted a true and correct copy via
25 electronic mail to the office(s) of the addressee(s) at the electronic mail address(es) listed
26 above.

27 I declare under penalty of perjury under the laws of the State of California that the
28 foregoing is true and correct. Executed on May 21, 2008 at San Francisco, California.

By: /s/ Rithy Keo
Rithy Keo
Legal Assistant